

From: [McIlwain, Serena](#)
To: [Woolford, James](#)
Cc: [SASMC Members](#); [SASMC Staff Contacts](#); [OSWER OSRTI IO](#)
Subject: FW: Guidance change
Date: Friday, May 01, 2015 9:22:30 PM
Attachments: [Approval of Disbursements to PRPs from SAs 2015 v1.docx](#)

Hello Jim,

Thank you for providing us the opportunity to comment on the proposed update to the 1998 guidance. In addition to answering the question you ask below, we have a couple of additional recommendations:

1. We agree with your proposal to allow the regional Superfund Division Director approval of disbursements from special accounts to PRPs;
2. Because regional Finance Offices no longer disburse funds, we recommend changing "Regional Financial Management Offices" to "Agency Finance Centers", and;
3. **Exemption 5 - Deliberative Process**

[REDACTED]

For your consideration,
Serena

From: Woolford, James
Sent: Thursday, April 30, 2015 9:55 AM
To: SASMC Members
Cc: SASMC Staff Contacts; OSWER OSRTI IO
Subject: Guidance change

SASMC Members –

It has come to our attention that the document, "Interim Final Guidance on Disbursements of Funds From EPA Special Accounts to CERCLA Potentially Responsible Parties," issued November 3, 1998, requires the approval of Regional Administrators (RA) to disburse funds from special accounts to PRPs pursuant to settlement agreements. The 1998 guidance for disbursement of special account funds to PRPs does not contemplate delegation from the RA to regional Superfund Division Directors, which is allowed in the case of disbursements of appropriated funds to PRPs pursuant to mixed funding settlement agreements.

Our staff are in the process of updating the 1998 interim final guidance and will clarify these procedures in that final product, but in the meantime some regions are currently preparing disbursement packages now and have requested that the regional Superfund Division Directors be

allowed to approve the packages. The attached memorandum updates the 1998 interim final guidance to allow RA or regional Superfund Division Director approval of disbursements from special accounts to PRPs. I don't see any significant policy issues on this change. We have been coordinating with OECA/OSRE on this issue.

Please let me know by **COB Wednesday, May 6th**, if you have any concerns with me signing the attached memo on behalf of the SASMC and issuing this to the regional SF DDs. Apologies this hasn't been discussed earlier with you, but the issue/request just recently came to our attention.

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